

**EXHIBIT 95**  
**-**  
**REDACTED VERSION OF**  
**ECF NO. 574-8**

# **EXHIBIT 7**

## **Excerpts of Deposition of Dana White**

**(Filed Under Seal)**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON )  
FITCH, on behalf of )  
themselves and all others )  
similarly situated, )

Plaintiffs, )

vs. )

ZUFFA, LLC, d/b/a Ultimate )  
Fighting Championship and )  
UFC, )

Defendant. )  
\_\_\_\_\_ )

Case No.  
2:15-cv-01045-RFB- (PAL)

HIGHLY CONFIDENTIAL  
VIDEOTAPED DEPOSITION OF DANA F. WHITE  
AFTERNOON AND EVENING SESSIONS  
LAS VEGAS, NEVADA  
AUGUST 9, 2017  
4:01 P.M.

REPORTED BY:  
MICHELLE R. FERREYRA, CCR No. 876  
JOB NO. 51036-B

<p style="text-align: right;">329</p> <p><b>DANA WHITE - HIGHLY CONFIDENTIAL</b></p> <p>A. He's a UFC fighter.</p> <p><b>Q. Former UFC?</b></p> <p>A. Yes.</p> <p><b>Q. Okay. And is it true, though, that your -- your view was that the fight between Bonnar and Tito literally meant nothing?</b></p> <p>A. Yes.</p> <p><b>Q. Okay. Is that because they were at a point in their careers where, you know, they were, you know, not ascending as fighters and the types of fighters that UFC would want in its promotion?</b></p> <p>A. No. It's my opinion. It's my opinion that it wasn't because I run my business completely different than Bellator runs theirs. I'm good at it and they're not.</p> <p><b>Q. And what does it mean to stack a card in an MMA bout?</b></p> <p>A. What does it mean?</p> <p><b>Q. Yes.</b></p> <p>A. It means to put on a bunch of great fights on one card.</p> <p><b>Q. Okay. And so in order to stack a card, you would need a lot of good fighters?</b></p> <p>A. You need to build talent.</p>	<p style="text-align: right;">331</p> <p><b>DANA WHITE - HIGHLY CONFIDENTIAL</b></p> <p>A. Oh, yeah, yeah. Yeah. Listen. The day that Viacom has the same balance sheet as me, that will be the day.</p> <p><b>Q. I think we're there.</b></p> <p>A. I would -- yeah.</p> <p><b>Q. So -- so in order to stack a card, you need talent; right?</b></p> <p>A. Yeah.</p> <p><b>Q. Okay.</b></p> <p>A. In -- in order to stack a card, you -- you need stars. You need to be able to build stars. And if you can build stars -- even if -- even if you're a promotion, you know, that -- that -- that is well established and you have some big names, you only have so many big names. You have to be able to go out and build stars. That's how you can stack a card. You can't stack a card without having a bunch of stars.</p> <p>And there aren't, you know, it's not like, you know, stars are just out there popping up everywhere. You have to be able to know who you think is talented, who you think could possibly be, you know, a world champion or a big fighter some day, then you turn these people into stars.</p> <p><b>Q. Is -- is it your testimony that you can't</b></p>
<p style="text-align: right;">330</p> <p><b>DANA WHITE - HIGHLY CONFIDENTIAL</b></p> <p><b>Q. But if -- if -- if you haven't done that, you can't stack a card; correct?</b></p> <p>A. Yeah. If you can't build talent, then you can't build stars. Yeah.</p> <p><b>Q. Well, in -- in theory, your promotion -- you could go out and acquire stars; right? You wouldn't have to build them?</b></p> <p>A. Yeah. You could go out and acquire stars --</p> <p><b>Q. Okay.</b></p> <p>A. -- but we build them.</p> <p><b>Q. Right.</b></p> <p>A. That's what we do.</p> <p><b>Q. But in order to stack a card, you need the talent; right?</b></p> <p>A. You need to be able to build stars.</p> <p><b>Q. Well, but I thought you could acquire the talent without building it?</b></p> <p>A. Well, yeah. I mean, companies like Viacom could go out and acquire any type of talent they want.</p> <p><b>Q. Right.</b></p> <p>A. They have billions of dollars, contrary to what you believe.</p> <p><b>Q. Not -- not withstanding the cash balances that you saw --</b></p>	<p style="text-align: right;">332</p> <p><b>DANA WHITE - HIGHLY CONFIDENTIAL</b></p> <p><b>stack a card as an MMA promoter unless you -- you, as the MMA promoter, have actually developed the stars yourself?</b></p> <p>A. Unless you -- yeah. You have to build stars.</p> <p>No.</p> <p><b>Q. You can't build --</b></p> <p>A. There's tons of fighters every single weekend. This weekend, there's fights happening all over the world. There's MMA promoters literally all over the world. And there are fights happening every weekend, this week, next weekend, last weekend. These fights are happening. Then what you do is you go out, you know, there's a team at the UFC, there's three of us, who go out, and we look at people.</p> <p>You know, what's crazy? Think about this.</p> <p>Four years ago, Conor McGregor was available to everybody. Bellator, ONE FC, UFC, everybody out there. Do you know who went out -- he was -- he was 7 and 2. Okay? Guy's record was 7 and 2. There's a zillion of them, right? I went and got Conor McGregor. I saw him, I liked his personality, and I turned him into a star, one of the biggest stars on earth right now. Bellator could have done that, ONE FC could have done it, they all could have done it. Four years ago, he</p>

14 (Pages 329 to 332)

<p style="text-align: right;">333</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 was available to everybody.</p> <p>3 Q. Are -- are you not understanding the</p> <p>4 question? Because the question is: Is it possible to</p> <p>5 stack a card by acquiring fighters rather than building</p> <p>6 them?</p> <p>7 A. I answered the question.</p> <p>8 Q. I don't think you did.</p> <p>9 A. I answered the question.</p> <p>10 MR. ISAACSON: That wasn't your last</p> <p>11 question, and his answer was to your last question.</p> <p>12 BY MR. DELL'ANGELO:</p> <p>13 Q. So then -- then let's -- let's see if we get</p> <p>14 this clear. Is it possible for an MMA promotor to</p> <p>15 stack a card without building -- without that MMA</p> <p>16 promotor building the talent himself?</p> <p>17 A. I don't understand the question.</p> <p>18 Do you want to know what's even crazier?</p> <p>19 Four years ago, Strikeforce had Rhonda Rousey.</p> <p>20 MR. ISAACSON: I'm going to -- I'm going to</p> <p>21 strike your answer. Let him --</p> <p>22 THE WITNESS: All right. I will stop. I'm</p> <p>23 getting crazy over here. I drank an energy drink.</p> <p>24 BY MR. DELL'ANGELO:</p> <p>25 Q. So it was your view in December of 2014 that</p>	<p style="text-align: right;">335</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Bellator?</p> <p>3 A. Yeah.</p> <p>4 Q. Okay. And you ask, "What the hell do they</p> <p>5 have to stack -- stack them with?"</p> <p>6 A. Yeah.</p> <p>7 Q. Do you see that?</p> <p>8 A. Right.</p> <p>9 Q. Okay. And are you -- are you saying that you</p> <p>10 believed, at the time you sent this text, that Bellator</p> <p>11 didn't have the fighters to stack a card with?</p> <p>12 A. Yeah. I -- I -- I love the competitive</p> <p>13 spirit here, that I -- that I should quit because I</p> <p>14 can't compete with the way they're going to stack their</p> <p>15 cards. I love that. That -- that's what I'm all</p> <p>16 about, number one.</p> <p>17 Number two, yeah. They could stack their</p> <p>18 cards if they built talent.</p> <p>19 Q. Right.</p> <p>20 A. But they're not good at it.</p> <p>21 Q. And --</p> <p>22 A. They're -- they're really not good at it.</p> <p>23 Q. And in December of 2014, you believed that</p> <p>24 they hadn't developed the talent to stack their cards</p> <p>25 with; right?</p>
<p style="text-align: right;">334</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 Bellator didn't have fighters to stack a card with?</p> <p>3 A. They did. Absolutely did.</p> <p>4 Q. So take a look at Exhibit 11, please. Would</p> <p>5 you take a look at Exhibit 11, please?</p> <p>6 A. Oh, okay. Okay.</p> <p>7 Q. Would you go to page 155.</p> <p>8 A. Yeah.</p> <p>9 Q. Okay. Would you take a look at row 3446,</p> <p>10 please.</p> <p>11 A. Yeah.</p> <p>12 Q. Okay. That's a text from your [REDACTED] -- or your</p> <p>13 [REDACTED] number; right?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And that's to Mr. Fertitta's [REDACTED]</p> <p>16 number; correct?</p> <p>17 A. Okay.</p> <p>18 Q. Okay? And it's dated December 8, 2014;</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And you're indicating in that text</p> <p>22 that you spoke to somebody who did play-for-play for</p> <p>23 Bellator; correct?</p> <p>24 A. I'm reading it right now. Yeah.</p> <p>25 Q. Okay. So this text message refers to</p>	<p style="text-align: right;">336</p> <p>1 DANA WHITE - HIGHLY CONFIDENTIAL</p> <p>2 A. Yeah. In my opinion, they had not, yes.</p> <p>3 Q. Okay. So --</p> <p>4 A. My opinion obviously was not the same as this</p> <p>5 guy's opinion.</p> <p>6 Q. Right. And so let's take a look -- well, are</p> <p>7 you familiar with the term "legend fights" in MMA?</p> <p>8 A. Legend fights?</p> <p>9 Q. Yeah.</p> <p>10 A. Okay.</p> <p>11 Q. No. I'm asking if you are familiar with the</p> <p>12 term?</p> <p>13 A. I'm not familiar.</p> <p>14 Q. Okay. Are you family with the term "a freak</p> <p>15 show fight"?</p> <p>16 A. Eh, I mean, freak show, that -- that's what I</p> <p>17 call some of the fights.</p> <p>18 Q. Okay. What's a freak show fight?</p> <p>19 A. So when I built this business, right,</p> <p>20 I -- I -- I set standards. So I was a huge boxing fan</p> <p>21 growing up. Okay? And I hated everything that boxing</p> <p>22 did. Loved the sport, but hated everything they did.</p> <p>23 So I had a vision in my mind of how I would do it and</p> <p>24 how I would change everything from the live event to</p> <p>25 the fights to how it's produced on television,</p>

15 (Pages 333 to 336)



<p style="text-align: right;">457</p> <p>1 2 STATE OF _____ ) 3 ) :ss 4 COUNTY OF _____ ) 5 6 7 I, DANA F. WHITE, the witness 8 herein, having read the foregoing 9 testimony of the pages of this deposition, 10 do hereby certify it to be a true and 11 correct transcript, subject to the 12 corrections, if any, shown on the attached 13 page. 14 15 _____ 16 DANA F. WHITE 17 18 19 20 Sworn and subscribed to before 21 me, this _____ day of 22 _____, 2017. 23 24 _____ 25 Notary Public</p> <p style="text-align: right;">458</p> <p>1 CERTIFICATE OF REPORTER 2 STATE OF NEVADA ) 3 COUNTY OF CLARK ) 4 I, Michelle R. Ferreyra, a Certified Court 5 Reporter licensed by the State of Nevada, do hereby 6 certify: That I reported the videotaped deposition of 7 DANA WHITE, commencing on WEDNESDAY, AUGUST 9, 2017 8 at 4:01 p.m. 9 That prior to being deposed, the witness was 10 duly sworn by me to testify to the truth. That I 11 thereafter transcribed my said stenographic notes into 12 written form, and that the typewritten transcript is a 13 complete, true and accurate transcription of my said 14 stenographic notes, and that a request has been made to 15 review the transcript. 16 I further certify that I am not a relative, 17 employee or independent contractor of counsel or of any 18 of the parties involved in the proceeding, nor a person 19 financially interested in the proceeding, nor do I have 20 any other relationship that may reasonably cause my 21 impartiality to be questioned. 22 IN WITNESS WHEREOF, I have set my hand in my 23 office in the County of Clark, State of Nevada, this 24 21st day of August, 2017. 25 _____ MICHELLE R. FERREYRA, CCR No. 876</p>	<p style="text-align: right;">459</p> <p>1 INSTRUCTIONS TO WITNESS 2 3 Please read your deposition over carefully 4 and make any necessary corrections. You should state 5 the reason in the appropriate space on the errata 6 sheet for any corrections that are made. 7 After doing so, please sign the errata sheet 8 and date it. 9 You are signing same subject to the changes 10 you have noted on the errata sheet, which will be 11 attached to your deposition. 12 It is imperative that you return the original 13 errata sheet to the deposing attorney within thirty 14 (30) days of receipt of the deposition transcript by 15 you. If you fail to do so, the deposition transcript 16 may be deemed to be accurate and may be used in court. 17 18 19 20 21 22 23 24 25</p> <p style="text-align: right;">460</p> <p>1 ERRATA 2 3 4 5 I wish to make the following changes, 6 for the following reasons: 7 8 PAGE LINE 9 _____ CHANGE: _____ 10 REASON: _____ 11 _____ CHANGE: _____ 12 REASON: _____ 13 _____ CHANGE: _____ 14 REASON: _____ 15 _____ CHANGE: _____ 16 REASON: _____ 17 _____ CHANGE: _____ 18 REASON: _____ 19 _____ CHANGE: _____ 20 REASON: _____ 21 22 23 _____ WITNESS' SIGNATURE _____ DATE 24 25</p>
--	--

46 (Pages 457 to 460)